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OFFICE OF GENERAL
COUNSEL

Edward Rathje
Manager
DLR Ventures, LLC
7477 Findhorn Drive
Reno, NV 89506
June 24, 2010

General Counsel's Office
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

RE: MUR 6306

Dear Sirs,


In response to your request for information, I am pleased to provide the following:

1. I initially invoiced the Sharon Angle campaign as specified in FAA 61.113 (a) and (c), the only relevant FAA regulations I knew of at the time. Violation of these regulations can result in the loss of my pilot certificate. The campaign paid my invoice immediately.
2. When I learned of the exception to this rule in FAR 91.321 and understood that payment was "pro rata per passenger", I immediately re-invoiced the campaign and they paid the additional cost immediately.
3. When I learned on June 2, 2010, that the FEC law was "pro rata per candidate", not per passenger, I immediately re-invoiced the campaign again.
4. The rental cost used in the corrected invoices for my 1966 Piper Cherokee Six, PA32-260, was \$190 per hour, as advertised by the Sundance Flying Club in Palo Alto, CA. <http://www.flysundance.org/>

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5. The invoices included the one-time \$10 initiation fee and the monthly \$45 temporary membership in order to obtain the \$190 rental rate.
 6. Note that the Sundance PA32-300 model, with 40 more HP, better avionics, and 3 years newer, is indeed a comparable aircraft.
 7. I was unaware of FAR 91.321 until June 2, as was my hanger-mate – a DHL 747 First Officer. I have asked several pilots since and none of them are aware of this regulation that allows an exception to the regulation that ALL pilots know – 61.113.
 8. The “\$7000” estimate in the complaint was made out of ignorance or intentionally to create a sensation. The final correct amount invoiced for the flight in question was \$1358.50, less previously paid incorrect invoices.
 9. DLR Ventures, LLC, is a single-member, single-manager LLC, which the IRS treats as a sole proprietorship on my personal 1040 Schedule C.
 10. As a private individual, with the aircraft legally isolated in my LLC, I was unaware of FEC regulations, and I complied with them as soon as I understood them. I had been familiar only with the FAR 61.113 since I began flying in 1965.
 11. Please let me know if you need copies of any invoices, which were sent via email to the Angle campaign.

Sincerely,



Edward Rathje
Manager, DLR Ventures, LLC